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Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: 911 Call-Forwarding Requirements for Non-Service-Initialized Phones,
PS Docket No. 08-51**

Dear Ms. Dortch:

On November 29, 2016, the undersigned met with David Furth, Timothy May, and Michael Connelly of the Commission's Public Safety and Homeland Security Bureau. The participants discussed the 911 and E911 capabilities of the handsets Verizon contributes to domestic violence prevention organizations through its HopeLine program.¹

HopeLine collects no-longer used wireless handsets from any service provider for recycling, and uses the proceeds to benefit victims and survivors of domestic violence, including through donations of new handsets for nonprofit organizations and agencies that support domestic violence victims to use for their clients. Through service agreements with those organizations, Verizon provides new service-initiated feature phones with their own telephone numbers, that are not restricted to 911 dialing, that deliver E911 ANI and ALI, and that have 911 callback capability. Thus, 911 calls from HopeLine phones are handled as "service initialized" and can be identified as originating from HopeLine users. Verizon does not have information, however, on the extent to which domestic violence prevention and other charitable organizations rely on non-service-initialized ("NSI") handsets, or on the number of NSI handsets those organizations have provided to consumers.

This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules. Please contact me if there are questions concerning this filing.

Sincerely,

¹ See <https://www.verizon.com/about/responsibility/domestic-violence-prevention>.